

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in interest to National City Bank,

Plaintiff,

v.

Des Plaines Yamaha & Suzuki, Inc.; Chicago Title Land Trust Company, as Successor Trustee to Harris Trust and Savings Bank as Trustee under Trust Agreement dated August 1, 1967 and known as Trust No. 32873; Beneficiaries of Chicago Title Land Trust Company, as Successor Trustee to Harris Trust and Savings Bank as Trustee under Trust Agreement dated August 1, 1967 and known as Trust No. 32873; Harvey Fields; Reid Fields,

Defendants.

Case No. 1:12 cv 07948

Assigned Judge: James B. Zagel

Magistrate Judge: Mary M. Rowland

Property Address:

1529 Rand Road  
Des Plaines, Illinois 60016

**MOTION FOR JUDGMENT OF FORECLOSURE AND SALE**

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest to National City Bank, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Des Plaines Yamaha & Suzuki, Inc.

Chicago Title Land Trust Company, as Successor Trustee to Harris Trust and Savings Bank as Trustee under Trust Agreement dated August 1, 1967 and known as Trust No. 32873;

Beneficiaries of Chicago Title Land Trust Company, as Successor Trustee to Harris Trust and Savings Bank as Trustee under Trust Agreement dated August 1, 1967 and known as Trust No. 32873

Harvey Fields;

Reid Fields;

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion attached hereto as Exhibit "A", and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in interest to National City Bank,

By: /s/Christopher S. Fowler  
One of Its Attorneys

Patrick D. Lamb (ARDC #3128062)  
Christopher S. Fowler (ARDC#6282889)  
CROWLEY & LAMB, P.C.  
221 N. LaSalle Street, Suite 1550  
Chicago, Illinois 60601  
(312) 670-6900  
[plamb@crowleylamb.com](mailto:plamb@crowleylamb.com)  
[cfowler@crowleylamb.com](mailto:cfowler@crowleylamb.com)